

# EXHIBIT A



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October 23, 2015

**Brian O'Connor Watson**  
312.258.5845  
[bwatson@schiffhardin.com](mailto:bwatson@schiffhardin.com)

**VIA EMAIL**

Robert G. McCoy  
Daniel Hausman  
Cascino Vaughan Law Offices, Ltd.  
220 S. Ashland Ave.  
Chicago, IL 60607

**Re: *Suoja v. Owens-Illinois, Inc.***

Dear Counsel:

We served requests to produce all written discovery, deposition transcripts, hearing transcripts, filings, and other documents from the prior state court action, *Suoja v. ACandS, Inc., et al.*, No. 97-cv-2370 (Wis. Cir. Ct. Dane Cty.). We also moved to compel full and complete responses when you failed to produce records from the state court action.

During the compulsion hearing, you represented that your "firm can't find the files from that earlier case"; "everything your firm has from that state court case has been turned over"; "you looked, everything you've got you turned over, there's no place else to look, there's nothing else to turn over"; and "your people have checked internally and there's nothing else to turn over." Hr'g Tr. 28-30, ECF No. 100.

In your pretrial disclosure, however, you have designated and produced deposition testimony of Harold Haase, who was deposed in the state court action by Robert McCoy. Pl.'s Discl. 3, ECF No. 122. We have also learned that Elmer Borchardt was deposed in the state court action by Robert McCoy. Dep. 1, ECF No. 108. Neither deposition—in fact, no deposition—was previously identified or produced from the state court action.

We request a full and complete production to Request Nos. 4-9 by 4:00 p.m. on October 26, or we will renew our motion to compel and seek any further relief under Rule 37.

Yours truly,

A handwritten signature in black ink that reads "BO'Connor Watson".

Brian O'Connor Watson

cc: Edward Casmere

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**Watson, Brian O.**

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**From:** Watson, Brian O.  
**Sent:** Friday, October 23, 2015 11:06 AM  
**To:** ecf.cvlo@gmail.com; 'mcascino.ecf@gmail.com'; Bob G. McCoy; 'Dan Hausman'  
**Cc:** Casmere, Edward M.  
**Subject:** Suoja v. Owens-Illinois  
**Attachments:** 17407107\_2.pdf

Please see the attached letter.

**Brian O'Connor Watson**

Attorney



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